

Exhibit F

COPY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CURTIS JAMES JACKSON III P/K/A 50 CENT,
TOMORROW TODAY ENTERTAINMENT, INC., A NEW YORK
CORPORATION, AND G-UNIT RECORDS, INC., A NEW
YORK CORPORATION,

Plaintiffs,

09-CV-5583

-against-

LEE Q. ODENAT A/K/A "Q" D/B/A
WWW.WORLDSTARHIPHOP.COM,

Defendant.

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DEPOSITION of the Defendant, LEE Q.
ODENAT, taken by the Plaintiffs, pursuant to
Notice, held at the offices of Jenner & Block,
Esqs., 919 Third Avenue, New York, New York, on
June 11, 2010, at 10:33 a.m., before a Notary
Public of the State of New York.

REPORTER'S INK, CORP.,
90 JOHN STREET
NEW YORK, NEW YORK 10038
646.395.2522

1 Odenat

2 relaunched.

3 Q. I'm going to ask you more about that
4 in a minute. I'm trying to just understand
5 your answer to this question. When you say
6 that the image, Bates number 3, was displayed
7 on the website, December '07/January '08, are
8 you indicating that it was up for
9 approximately that two-month period, or are
10 you attempting to tell me a start date when
11 it went up?

12 A. Just January '08. I'm not sure.

13 Q. January '08, what? That it was
14 displayed for the month of January '08 or
15 that's a start date?

16 A. It was there until Theo e-mailed me to
17 take it down.

18 Q. You're giving me a start date. So the
19 start date was either December '07 or January
20 '08?

21 A. Correct.

22 Q. And then it was up --

23 A. Until Theo e-mailed --

24 Q. Continuously until you got --

25 A. An e-mail from Theo saying take it

1 Odenat

2 down. I obliged. I did it and then three
3 months later you were serving me.

4 Q. Have you ever been sued before?

5 A. No. I'm a good man. Everyone loves
6 me. Hey, I'm ready to go with that. That's
7 nothing right there.

8 Q. You're indicating that this is
9 nothing?

10 A. Well, because, I mean, again, this is
11 a -- I don't do banners. I'm not a graphic
12 designer.

13 Q. Let's go ahead and mark what we've
14 been talking about Bates 3 as Plaintiffs'
15 Exhibit 1 and that's the image we were
16 talking about.

17 (Whereupon masthead was marked
18 Plaintiffs' Exhibit 1 for
19 identification as of this date.)

20 Q So you've indicated that it went up on
21 the website approximately January '08 and it
22 was not taken down until you received a cease
23 and desist letter from Mr. Sedlmayr; is that
24 correct?

25 A. He e-mailed me and said take it down.

1 Odenat

2 You have 48 hours to take it down.

3 Q. Let's go ahead and mark now as
4 Plaintiffs' Exhibit 2 a letter that I will --

5 (Whereupon letter was marked
6 Plaintiffs' Exhibit 2 for
7 identification as of this date.)

8 A. It would have been down sooner if Mr.
9 Jackson didn't tell me to keep it up.

10 Q. Okay. Well, we're going to talk about
11 that too.

12 A. All right.

13 Q. Yeah, don't worry about that. That
14 Plaintiffs' Exhibit 2 that's been marked now,
15 is that the correspondence from Mr. Sedlmayr
16 that you received via e-mail that told you to
17 take the image down?

18 A. It looks like it, yeah.

19 Q. What is the date of that letter?

20 A. March '09.

21 Q. That image was up at least from
22 January '08 until March of '09; is that
23 correct?

24 A. Yes.

25 Q. All right. Now, when you put the

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2 A. No, because a lot of people work for
3 me.

4 Q. All right. Let's name everybody that
5 works for you.

6 A. Let me see. We got Ed and myself.

7 Q. Ed is your technology guy whose last
8 name you don't know, but he lives in Texas;
9 is that right?

10 A. Yes.

11 Q. Who else?

12 A. Me and we have a new staff now. I
13 have many people working for me now.

14 Q. Name them. Tell me what they do.

15 A. I have Kevin Black. He used to run
16 Interscope Records for ten years.

17 Q. What does he do for you?

18 A. I made him president.

19 Q. Of what?

20 A. World Star Hip Hop. I have Tim
21 Hernandez.

22 Q. Hold on.

23 A. He's my legal team.

24 Q. Hold on a second. I'm getting this
25 down. Who is the next person?